

DRAFT GROUP CERTIFICATION METHODOLOGY

Public consultation period: **20.05 - 20.06.2016**

Please send your comments before **20.06.2016** to: standards@asc-aqua.org

Agreement

By sending this filled out comment form to ASC, we agree to have our comments published on the ASC website without personal names but of the organisation that we represent.

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1. Cover page - General comments (*comments on audit report template can also be entered here*)
1. ASC Requirements for the Certification of Producer Groups
2. Changes to the CAR v.2.0_ Unit of Certification and Annex F

General comments that do not relate directly to the content of the following worksheets (page 1-5)

Reference (if applicable)	<p>Group Management Body (GMB) autonomy: The new document titled, ASC Requirements for the Certification of Producer Groups (Group Certification), places significant onus, responsibility and decision-making flexibility on the GMB. It is irresponsible that "internal inspections" by the GMB are used to determine conformance, particularly when new sites can be added without going through the formal audit process by a CAB. This autonomy will inevitably allow Non-conforming sites to be certified, as this loophole is exploited. Allowing sites to be added without an audit process puts the credibility of the ASC at risk, and raises questions as to whether the scheme's ISEAL requirements would be appropriately met.</p>
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Ensuring Conformance of the Group Management Body (GMB) to the ASC Requirements for the Certification of Producer Groups (Group Certification): The new document titled, *ASC Requirements for the Certification of Producer Groups (Group Certification)*, places significant onus, responsibility and decision-making flexibility on the GMB (see above comment). Therefore, it should be a requirement that the CAB assesses that the GMB is meeting their requirements and raises Non-Conformance against the GMB as necessary. However, the proposed audit report and CAR changes do not adequately address this. While 17.1.4.1 and F8 state the GMB must "conform" to their requirements, there is no guidance to the CAB on whether this means they should apply a Minor/Major NC, nor what the process is for suspension/withdrawing. The audit report tab *Group Cert. Requirements* (tab 2) leaves space for "evaluation" instead of providing a drop down menu to allow for the CAB to select "Major NC/MinorNC/Conforms".

Regional Management Based Standard vs. Performance Metric Based Standard: The SeaChoice member organizations have been actively involved with the ASC in a number of ways including, but not limited to, Steering Committee advisors on the Aquaculture Dialogues, members to the Technical Advisory Group, and stakeholders in ongoing certification audits. The proposed 'group certification' contradicts the Aquaculture Dialogues' rationale and the consequential premise that the ASC standards were established to be performance-based derived from *farm level metrics*. Changing this fundamentally undermines the standards' ability to be specific, measurable and to drive continuous improvements and instead allows for greater probability of non compliance, thus threatening the credibility of the ASC certification.

ToR; ASC Requirements for the Certification of Producer Groups (Group certification); CAR Annex F and A	<p>Reinstate and Clearly Define the Group Size: The Terms of Reference (ToR) for Development of ASC Group Certification Methodology refers to the following definition to be applied for the development of the methodology: "5.4 Small-scale aquaculture: Aquaculture farms with small production volume, and/or relatively small surface area, mainly without permanent labour, and typically lacking technical and financial capacity to support individual certification (FAO, Technical Guidance on Aquaculture certification)." The ASC project website states, "Group certification will enable ASC to operate as an inclusive programme, ensuring that certification is attainable for a broad range of producers including valuable opportunities for small-scale operations to become certified." The ASC Requirements for the Certification of Producer Groups (Group Certification), page 2, states, "These ASC Group Certification requirements seek to make certification against ASC standards for responsible aquaculture attainable for smallholder farmers , " but goes on to say, "This document sets out the requirements for certification against an ASC Standard by a Group of two or more aquaculture operations, regardless of their size". The proposed definition to be added to the CAR for Group Certification also states, "... regardless the size of their site(s) ". This appears to be a contradiction of the aim and rationale of the standard, as well as opening up the potential for large-sized operations to apply which could undermine the ASC's rationale for the multi-site certification. The normative references of the draft ASC Requirements for the Certification of Producer Groups (Group Certification) document and the proposed changes to the CAR do not explicitly call-out the requirement for a group member/site to be small-scale. Reinstate and add the ToR definition for small-scale aquaculture (5.4)to both the CAR and producer group document. The definition should be listed Annex A of the CAR and to the ASC Vocabulary.</p>
ASC Requirements for the Certification of Producer Groups (Group certification); CAR Annex F and A	<p>Define a Maximum Number of Group Members and Sites Allowed: No where in the draft methodology or documents is a limit on the number of group members or sites mentioned. Without a defined limit, the 'blanket certification' of large numbers of farms will mean the ASC is allowing for greater risk and possibility of Non-Conformities being missed. A more precautionary approach would be to define a maximum number (recommended at 5-10) that the ASC could then assess the risks at a later date.</p>

Requirements for the Certification of Producer Groups (Group certification); CAR Annex F and A	<p>Define What a 'Waterbody' is and Therefore the Scope: The draft ASC Requirements for the Certification of Producer Groups (Group Certification) 3.3.3.2 and the proposed CAR Annex F refers to operating in the same water body(ies) (Table F2). This allows for great subjectivity by CABs and the GMB. Defining the boundaries of a waterbody will minimize this subjectivity. We recommend the waterbody be defined as a strait, fjord, sound versus an ocean or coastal area of a country. The definition should then be applied to the Annex A and F of the CAR and in the normative and vocabulary of the Producer Groups document.</p>
	<p>Risk Classification and Evaluation Matrix (Tables F1 and F2): Basing the methodology heavily on 'management' threats is ill conceived as this cannot appropriately assess the environmental performance-metrics of the standard(s). Environmental performance can vary dramatically under the same management regime from one site to another. In addition, CABs should not be given the responsibility and/or the discretion to identify additional threats and thresholds for the risk classification. These should be robustly and credibly determined by the ASC.</p>
	<p>Sampling size and the associated algorithm: SeaChoice asserts the resulting auditing sample sizes from the associated algorithm are unacceptable (for example 4/50 "low risk" to 22/50 "high risk"). These proposed parameters do not reach an acceptable 'confidence level' to ensure ASC's credibility. Instead it will allow for an increase in the probability of Non Conformities being missed.</p> <p>We propose defining a group member/site limit of X and that all farms should be audited based on environmental metrics of the standard, specifically Principles 2-5, (social, legal and community criteria being possibly justified as exceptions where multi-site methodology may be feasible) and incorporating parameters for farm size limits.</p>

ASC Develop an ABM Standard: The proposed methodology fails to address cumulative and area-based impacts of group site farms, and in fact as set up could create the potential for unfortunate situations (e.g. all sites experience escapes or use of WHO antibiotics below a site-level threshold but result in a questionable cumulative impact) however all remain certified. The ASC standards were created to be farm-site specific and do not adequately address cumulative impacts. It is recommended ASC develop an ABM Standard approach to address this deficiency and to ensure credibility of the standard.

Hatcheries: Hatcheries are not addressed in this draft which means CABs are not guided or are free to select sites all sourcing from the same hatchery. In other words, if a group member sources from 4 hatcheries, possibly only 1 hatchery would be covered. Hatcheries should be reflected in a system for representative site selection.

CAB reporting and public information for stakeholders: Reporting of site information in group certification is not addressed. What public information would be available for stakeholders? How are stakeholder comments prior, during and post audit on non-audited farms appropriately addressed and incorporated into the process?(I.e. if a Major NC is identified by a stakeholder on a non-audited farm- what is the process for the CAB?). This should then require a full audit of the farm.

